

Anti Slavery Policy

This policy is met by all members of Recyclatex.

Introduction

Modern slavery is a crime which results in the abuse of the human rights of men, women and children throughout the world. Modern Slavery is the illegal exploitation of people for personal or commercial gain. Victims are trapped in servitude, which they were deceived or coerced into, and feel that they cannot leave.

The UK Government introduced the Modern Slavery Act 2015 to tackle the growth of modern slavery. The Government is committed to stamping out this abhorrent crime. The new Modern Slavery Bill is amongst the first Acts in the world specifically tackling modern slavery and reflects the Government's determination that the UK lead the global fight.

How this affects Recyclatex Members

We (all Recyclatex members) strongly support the aims and provisions of the Act and are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our businesses.

Our workforce and suppliers are of critical importance to the business. One of our core aims is to ensure that staff are happy, engaged and have a long-term career and future with the business. Slavery and human trafficking does not support these core aims and goes against the member Companies beliefs both morally and ethically.

This policy has been drafted to outline the measures that the individual Companies take to prevent slavery and human tracking as well as the procedures that their staff can follow to raise any concerns about slavery and human trafficking.

This policy does not form part of any employee's contract of employment and may be amended at any time. However the expectation is that all employees will adhere to the principle and sentiment of the policy at all times in all Recyclatex related dealings or transactions.

Recruitment

Each member Company has recruitment procedures in place to ensure that all applicants for employment are legally entitled to work in the UK and to verify the identity and status of all

employees. Each Company takes measures to ensure that the bank and personal details provided by new employees are consistent with those provided during the selection process. During recruitment interviews the Companies are vigilant to any signs of a candidate being coerced into employment; this could include signs of distress, desperation or a candidate applying for work that they are clearly over qualified to perform.

Risk Assessment

The Member Companies are vigilant to the risk of slavery and human trafficking within its own operations and has measures in place to ensure it promotes ethical employment practices and that of its workers are there of their own free will.

The Member Company and its managers will take action in the event of any workers displaying signs of potential slavery and human trafficking; this could include evidence of physical abuse such as bruising or other unexplained injuries, as well as signs of poverty, such as appearing malnourished, exhausted, frightened or distressed.

Supply Chain

Where the Companies use the services of agencies or other suppliers of labour then it will take measures to ensure that the supplier has legally compliant employment practices which should include evidence of commitment to ensuring its own business operations are free of slavery and human trafficking. The Companies may require suppliers to provide them with evidence of their own internal employment policies and procedures and may conduct onsite audits of agencies to verify their employment practices both procedurally and ethically.

Responsibilities

It is the responsibility of both managers and employees to be vigilant of the signs of slavery, both internally and through the use of external suppliers, and to escalate as necessary.

Employees must notify a manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

The Companies aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. They are committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is, or may be, taking place in any part of its own business.

Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

The Companies may terminate any relationship with other individuals and organisations working on our behalf if they are seen to be in breach of this policy.

Annual Review

Each member Company will keep its operations and supply chain under constant review to ensure that any risk of slavery and human trafficking is identified.

Each Company will review its policies and procedures regularly to ensure that they are appropriate and proportionate for addressing the risk of slavery and human trafficking within its operations and supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour.

Recyclatex and its member Companies have a zero tolerance approach to any form of modern slavery.

We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chains.